

# EXHIBIT Q

# Estate of Carolyn Bekkedahl

# VCF Documentation



September 11th  
Victim Compensation Fund

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December 23, 2019

MARY ANN BEKKEDAHL-PARENT  
C/O WENDELL TONG  
SULLIVAN PAPAIN BLOCK MCGRATH & CANNAVO, PC  
120 BROADWAY 18TH FLOOR  
NEW YORK NY 10271

Dear MARY ANN BEKKEDAHL-PARENT:

The September 11th Victim Compensation Fund ("VCF") has reviewed your Eligibility Form. You submitted an Eligibility Form on behalf of CAROLYN BEKKEDAHL. Your claim number is VCF0109917. Your Eligibility Form was determined to be substantially complete on December 20, 2019. As stated in the Regulations and on the claim form, by filing a substantially complete Eligibility Form, you have waived your right to file or be a party to a September 11th-related lawsuit on behalf of the decedent and his or her survivors.

#### **The Decision on your Claim**

The VCF has determined that the decedent has met the eligibility criteria established in the statute and regulations. Based on the information you submitted and information the VCF has received from the World Trade Center ("WTC") Health Program, the decedent has been found eligible for the following injuries:

- MALIGNANT NEOPLASM OF UNSPECIFIED OVARY

Please note that there are several reasons why an injury that you think should be eligible is not listed above. For non-traumatic injuries, the name of the injury is based on the information provided by the WTC Health Program and there may be different names for the same injury. Additionally, your injury may not be listed if it was only recently certified for treatment by the WTC Health Program.

If in the future the WTC Health Program should notify you that a condition previously found eligible is no longer certified, you must inform the VCF as this may affect your eligibility status and/or the amount of your award.

#### **What Happens Next**

**If the decedent was certified for treatment by the WTC Health Program for a condition not listed above**, you should amend your claim. Please see the VCF website for details on how to amend your claim. The VCF will review the new information and determine if it provides the basis for a revised decision.

**If you believe the decedent had eligible injuries not treated by the WTC Health Program** and you would like the VCF to consider those injuries before calculating the amount of any compensation, you should amend your claim. If you choose to amend your claim, you will need



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to use the VCF Private Physician process. The Private Physician process is a way for the VCF to gather the required information about the decedent's treatment in order to process your claim. All forms are available on the VCF website under "Forms and Resources." The website also includes detailed information and instructions on the Private Physician process.

**If the decedent did not have injuries other than those listed above,** you should submit your Compensation Form and required supporting materials. If you have already submitted your Compensation Form, you do not need to take any action at this time unless you receive a request from the VCF for missing information. The VCF will calculate the amount of any compensation based on the conditions listed above after all compensation-related documents are submitted.

If you have questions about the information in this letter or the claims process in general, please call our toll-free Helpline at 1-855-885-1555. For the hearing impaired, please call 1-855-885-1558 (TDD). If you are calling from outside the United States, please call 1-202-514-1100.

Sincerely,

Rupa Bhattacharyya  
Special Master  
September 11th Victim Compensation Fund

cc: MARY ANN BEKKEDAHL-PARENT



September 11th  
Victim Compensation Fund

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May 29, 2020

MARY ANN BEKKEDAHL-PARENT  
221 ELDERWOOD AVENUE  
PHELHAM NY 10803

Dear MARY ANN BEKKEDAHL-PARENT:

The September 11th Victim Compensation Fund ("VCF") has reviewed your claim for compensation. Your claim number is VCF0109917. Your claim form was determined to be substantially complete on March 27, 2020. This means your claim was deemed "filed" for purposes of section 405(b)(3) of the Statute on that date.

After reviewing the responses in your claim form, the documents you submitted in support of your claim, and information from third-party entities, the VCF has calculated the amount of your award as **\$1,425,947.61**. This determination is in accordance with the requirements of the Never Forget the Heroes: James Zadroga, Ray Pfeifer, and Luis Alvarez Permanent Authorization of the September 11th Victim Compensation Fund Act ("VCF Permanent Authorization Act"). The enclosed "Award Detail" includes a detailed explanation of the calculation and a list of the eligible conditions that were considered when calculating your award.

No non-routine legal service expenses are approved for reimbursement for this claim.

As the Personal Representative, you are required to distribute any payment received from the VCF on behalf of the victim to the eligible survivors or other recipients in accordance with the applicable state law or any applicable ruling made by a court of competent jurisdiction or as provided by the Special Master.

### **What Happens Next**

The VCF will deem this award to be final and will begin processing the full payment on your claim unless you complete and return the enclosed Compensation Appeal Request Form within **30 days from the date of this letter** as explained below. If you do not appeal, the Special Master will authorize the payment on your claim within 20 days of the end of the 30-day appeal period. Once the Special Master has authorized the payment, it may take up to three weeks for the United States Treasury to disburse the money into the bank account designated on the VCF ACH Payment Information Form or other payment authorization document you submitted to the VCF.

- **Appealing the Award:** You may request a hearing before the Special Master or her designee if you believe the amount of your award was erroneously calculated, or if you believe you can demonstrate extraordinary circumstances indicating that the calculation does not adequately address your loss. **If you choose to appeal, your payment will not be processed until your hearing has been held and a decision has been rendered on your appeal.**



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To appeal the award, you must complete two steps by the required deadlines:

1. Complete and return the enclosed **Compensation Appeal Request Form** within **30 days from the date of this letter**. Follow the instructions on the form and upload it to your claim or mail it to the VCF by the required deadline. If you do not submit your completed Compensation Appeal Request Form within 30 days of the date of this letter, *you will have waived your right to an appeal* and the VCF will begin processing any payment due on your claim.
2. Complete and submit your **Compensation Appeal Package** (Pre-Hearing Questionnaire, Compensation Explanation of Appeal, and all applicable supporting documents) no later than **60 days from the date of this letter**. It is important that you carefully review the information enclosed with this letter and follow the instructions if you intend to appeal your award. Additional instructions on the appeals process can be found on the VCF website under "Frequently Asked Questions" and in the "Policies and Procedures" document.

Once your complete Compensation Appeal Package is submitted, the VCF will review the information to confirm you have a valid appeal, and will notify you of the next steps specific to your appeal and the scheduling of your hearing.

- **Notifying the VCF of new Collateral Source Payments:** You must inform the VCF of any new collateral source payments you receive, or become entitled to receive, such as a change to your disability or survivor benefits, as this may change the amount of your award. If you notify the VCF within 90 days of learning of the new collateral source payment, your award will not be adjusted to reflect the new entitlement or payment. If you notify the VCF more than 90 days after learning of the new or revised entitlement or payment, the VCF may adjust your award to reflect the new payment as an offset, which may result in a lower award. If you need to notify the VCF of a new collateral source payment, please complete the "Collateral Offset Update Form" found under "Forms and Resources" on the [www.vcf.gov](http://www.vcf.gov) website.

Your award was calculated using our published regulations, and I believe it is fair and reasonable under the requirements of the VCF Permanent Authorization Act. As always, I emphasize that no amount of money can alleviate the losses suffered on September 11, 2001.

If you have any questions, please call our toll-free Helpline at 1-855-885-1555. Please have your claim number ready when you call: **VCF0109917**. For the hearing impaired, please call 1-855-885-1558 (TDD). If you are calling from outside the United States, please call 1-202-514-1100.

Sincerely,

Rupa Bhattacharyya  
Special Master  
September 11th Victim Compensation Fund

cc: WENDELL TONG



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## Award Detail

Claim Number: VCF0109917  
Decedent Name: CAROLYN BEKKEDAHL

<b>PERSONAL INJURY CLAIM (Losses up to Date of Death)</b>	
<b>Lost Earnings and Benefits</b>	
Loss of Earnings including Benefits and Pension	\$716,220.00
Mitigating or Residual Earnings	(\$311,349.00)
<b>Total Lost Earnings and Benefits</b>	<b>\$404,871.00</b>
<b>Offsets Applicable to Lost Earnings and Benefits</b>	
Disability Pension	\$0.00
Social Security Disability Benefits	(\$87,884.77)
Workers Compensation Disability Benefits	\$0.00
Disability Insurance	(\$293,912.41)
Other Offsets related to Earnings	\$0.00
<b>Total Offsets Applicable to Lost Earnings</b>	<b>(\$381,797.18)</b>
<b>Total Lost Earnings and Benefits Awarded</b>	<b>\$23,073.82</b>
<b>Other Economic Losses</b>	
Medical Expense Loss	\$0.00
Replacement Services	\$0.00
<b>Total Other Economic Losses</b>	<b>\$0.00</b>
<b>Total Economic Loss</b>	<b>\$23,073.82</b>
<b>Total Non-Economic Loss</b>	<b>\$250,000.00</b>
<b>Subtotal Award for Personal Injury Claim</b>	<b>\$273,073.82</b>



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<b>DECEASED CLAIM (Losses from Date of Death)</b>	
<b>Loss of Earnings including Benefits and Pension</b>	<b>\$1,449,058.00</b>
<b>Offsets Applicable to Lost Earnings and Benefits</b>	
Survivor Pension	\$0.00
SSA Survivor Benefits	\$0.00
Worker's Compensation Death Benefits	\$0.00
Other Offsets related to Earnings	\$0.00
<b>Total Offsets Applicable to Loss of Earnings and Benefits</b>	<b>\$0.00</b>
<b>Total Lost Earnings and Benefits Awarded</b>	<b>\$1,449,058.00</b>
<b>Other Economic Losses</b>	
Replacement Services	\$101,957.00
Burial Costs	\$3,833.75
<b>Total Other Economic Losses</b>	<b>\$105,790.75</b>
<b>Total Economic Loss</b>	<b>\$1,554,848.75</b>
<b>Non-Economic Loss</b>	
Non-Economic Loss - Decedent	\$250,000.00
Non-Economic Loss - Spouse/Dependent(s)	\$100,000.00
<b>Total Non-Economic Loss</b>	<b>\$350,000.00</b>
<b>Additional Offsets</b>	
Social Security Death Benefits	(\$255.00)
Life Insurance	(\$751,719.96)
Other Offsets	\$0.00
<b>Total Additional Offsets</b>	<b>(\$751,974.96)</b>
<b>Subtotal Award for Deceased Claim</b>	<b>\$1,152,873.79</b>



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<b>Subtotal of Personal Injury and Deceased Claims</b>	\$1,425,947.61
PSOB Offset	\$0.00
Prior Lawsuit Settlement Offset	\$0.00
<b>TOTAL AWARD</b>	<b>\$1,425,947.61</b>
<b>Factors Underlying Economic Loss Calculation</b>	
Annual Earnings Basis (without benefits)	\$591,482.58
Percentage of Disability attributed to Eligible Conditions - applicable to Personal Injury losses	100.00%
Start Date of Loss of Earnings Due to Disability - applicable to Personal Injury losses	01/01/2016

<b>Eligible Conditions Considered in Award</b>
Malignant Neoplasm of Unspecified Ovary

# Solatium Claimants' Affidavits

Barbara Bekkedahl

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

----- X  
JILL ACCARDI, et al.,

**AFFIDAVIT OF  
BARBARA BEKKEDAHL**

Plaintiffs,

21-CV-06247 (GBD)(SN)

V.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

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STATE OF NEW YORK )  
: SS  
COUNTY OF SUFFOLK )

BARBARA BEKKEDAHL, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 81 Newton Lane PMB 149, East Hampton, NY 11937.
2. I am currently 64 years old, having been born on March 21, 1959.
3. I am the sister of Decedent, Carolyn Bekkedahl, upon whose death my claim is based, and submit this Affidavit in connection with the present motion for a default judgment and in support of my solatium claim.
4. My sister passed away from metastatic ovarian cancer on December 20, 2017, at the age of 57. It was medically determined that this illness was causally connected to her exposure to the toxins resulting from the September 11, 2001, terrorist attacks at the World Trade Center.

5. Carol is my sister, 15 months younger. We grew up in many places in the U.S. and abroad, as the daughters of a Navy Officer. Carol and my other two sisters were raised as a tight knit family, encountering all new neighborhoods and schools together frequently, throughout our youth. As Carol was closest in age to me, we were inseparable as kids.

6. Carol was a resident in the NYC Exposure Zone on 9/11. She returned to her apartment from her job after the towers fell, as her child and husband were downtown that morning. When they were reunited, I believe they left the city but returned shortly to their Tribeca apartment, as the zone was cleared for residents to return. Carol continued to live there until she died in 2017.

7. Carol's case of ovarian cancer was detected at her annual gynecology appointment and was classified as stage 4. She underwent surgery three weeks later to remove the cancerous growth, followed by a course of chemotherapy. She was considered in remission after about nine months of treatment. The cancer came back and metastasized to her lung and liver. The doctors treated her for another two years, but finally she succumbed to the disease. She was always tethered to her doctors and treatment. She managed to take a few trips and spend time with her family. But she also suffered many physical setbacks and pain. Carol was spiritual, and this helped provide comfort and strength throughout the remainder of her life.

8. I miss Carol every day. She was a constant in my life, and we always shared time together. As we both raised families, we gathered for holidays and other family events. We visited the beach together. We were both career women in advertising and provided each other counsel on our professional lives. We talked multiple times a week about everything.

I am fortunate to have two other sisters, but Carol was always my closest sibling. There is a void in my life because of the cancer brought on by the horrible devastation on the 9/11 attacks.

*Barbara Bekkedahl*

BARBARA BEKKEDAH

Sworn before me this

19<sup>th</sup> day of July, 2023

*Dianna Peralta NYS 03*

Notary public



Julia Skrak

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

----- X

In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

----- X  
JILL ACCARDI, et al.,

**AFFIDAVIT OF  
JULIA SKRAK**

Plaintiffs,

21-CV-06247 (GBD)(SN)

V.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

----- X

STATE OF NEW YORK )  
: SS  
COUNTY OF NEW YORK)

JULIA SKRAK, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 60 Thomas Street, Floor 2, New York, NY 10013.
2. I am currently 29 years old, having been born on October 30, 1993.
3. I am the daughter of Decedent, Carolyn Bekkedahl, upon whose death my claim is based, and submit this Affidavit in connection with the present motion for a default judgment and in support of my solatium claim.
4. My mother passed away from metastatic ovarian cancer on December 20, 2017, at the age of 57. It was medically determined that this illness was causally connected to her exposure to the toxins resulting from the September 11, 2001, terrorist attacks at the World Trade Center.

5. Carolyn worked in ad sales. She was a larger-than-life character. Not only was she a powerful businesswoman, she was also a very loving friend, wife, and mother. I was shy in school, so we did everything together. She was my mom and best friend. I can't even begin to describe the kind of impact she had on my life. She was my whole life. I have so many special memories of family dinners, family vacations, advice she has given me, her laughter, and her care for me. I have a special memory of a girl's trip we took after her first round of chemotherapy and surgery. I was also going through a hard time in school. We were both so scared and sad about what was happening to her, but we made the best of it. We cried a lot, but we also had little dance parties and tried to joke around. Even though she was in so much pain from her surgery, she put on a brave face for me and had fun. She was so brave that weekend so that I could be okay and find the strength to go back to school. Now that I am older, I think about her every day. I try to live my life in a way that she would be proud of. I think the best thing about her was how she made everyone feel when they spoke to her. They could feel her warmth and love. People were always so comfortable around her. I was so lucky to be her daughter.

6. My mother was employed by Weider Publications. She worked in midtown Manhattan but walked all the way to Tribeca to pick me up from school on the day of September 11<sup>th</sup>, 2001. We lived below Canal Street at 60 Thomas Street, New York, NY 10013 and we lived there until she passed away.

7. My mother was diagnosed with ovarian cancer in December 2012. The first surgery was very difficult. They removed a lot of her intestinal system, so she was in constant pain for months. She went from being a very active person to being unable to leave the house. Then, she went through rounds of chemotherapy. The chemotherapy was terrible. Every few months, the

chemotherapy she was taking would stop being effective, so she would need to switch to an even more aggressive chemotherapy. Things took a turn about eight months before she passed, when liquid filled her abdomen, and she was in constant pain.

8. I don't think I have words to describe the impact my mother had on me. She was the best mom in the world. Whenever any of my friends would meet her, they would tell me it was like meeting my twin; that was the best compliment in the world. She was the coolest, funniest, and most beautiful person I have ever met. I will never get over losing my mother so young. Losing her to a painful and cruel illness like cancer was horrible. I had to watch her suffer. I had to watch my dad suffer. I am so sad that my husband and our future children will never get to meet the woman who made me who I am.



JULIA SKRAK

Sworn before me this  
17<sup>th</sup> day of Oct., 2023  
Notary public

PERRY DONDRE STEVEN  
Notary Public, State of New York  
No. 01PE6368561  
Qualified in New York County  
Commission Expires December 18, 2025